

## Comment on air quality BCS

1 message

John Arsenault <johnarsenault@me.com>
To: airdivision1@deq.virginia.gov
Cc: John Arsenault <johnarsenault@mac.com>

Thu, Sep 6, 2018 at 3:53 PM

#### Sir. Ma'am

Attached is a letter to the editor that I drafted and was published in the Farmville Herald last Friday - I want this to be my comment in support of the Atlantic Pipeline Project and specifically my thoughts on the air quality issue related to the Buckingham Compressor Station. Basically, the air quality requirements for this compressor station are more stringent than compressor stations in other states on the ACP route. This is a good example of working with industry and everyone in Virginia will benefit from this pipeline project. In my letter to the editor you will see that I have extensive experience in pipeline/pump-commprssor station construction and operations. This is a great opportunity for Virginia and is safe and clean.

Semper Fidelis John

John L. Arsenault LtCol, USMC (ret) Owner, Arsenault Company LLC 2371 Spring Creek Rd Cullen, VA, 23934

cell - 540.419.2497

johnarsenault@mac.com

jla@arsenaultcompany.com

http://www.arsenaultcompany.com/#

War is an ugly thing, but not the ugliest of things: the decayed and degraded state of moral and patriotic feeling which thinks nothing worth a war, is worse... A man who has nothing which he is willing to fight for, nothing which he cares more about than he does about his personal safety, is a miserable creature who has no chance of being free, unless made and kept so by the exertions of better men than himself.

John Stuart Mill - 1862

I am an avid proponent for the Atlantic Coast Pipeline (ACP) and have been for several years now. My comments today are related specifically to the current ACP / DEQ air emissions review and public hearings related to a permit request by ACP for the Buckingham Compressor Station. From my background while working in the Alaska oilfields during my 30 years of living there, I want to again express my complete support for this project. My personal support is based on real world experience in the construction of pipelines/pump (compressor) stations in the most harsh environment in America, were wind chill temperatures can reach more than 100 degrees below 0 and the most environmentally sensitive landscape in America, were permafrost covers hundreds of miles of the pipeline path and facility sites. Here in Virginia, the air quality questions are worth consideration, but please know that this pipeline and compressor station, currently considered for construction, truly benefit from the latest clean air technologies and the highest standards of construction oversight/requirements. Please review the following text from the DEQ, Buckingham Compressor Station Air permit Summary web page: "The permit establishes pollution limits with associated monitoring, record keeping, and reporting to assure the limits are met on an on-going basis. The Department of Environmental Quality (DEQ) required the permit applicant, Atlantic Coast Pipeline, LLC (ACP) to provide an extensive Best Available Control Technology (BACT) analysis and air quality dispersion modeling. The pollutant limits and monitoring requirements in the draft permit are more restrictive than the permits already issued in neighboring states for similar stations along the Atlantic Coast Pipeline." (Bold underline my edit) The air quality oversight is very thorough and the operational safeguards are extensive. In conclusion, from having personal experience in the construction and the operational requirements of projects much more difficult than the ACP, I am an avid supporter of this project. Remember, natural gas is a very clean and safe energy product that can provide a secure energy future for all of Virginia. Industry and our local citizens both benefit from this project and the resulting stable long term energy source.

Sincerely John Arsenault Cullen, VA

Contact information: address; 2371 Spring Creek Rd Cullen, VA, 23934 Phone; 540.419.2497

Email; johnarsenault@mac.com



# **Approve to Buckingham Compressor Station public comment letter**

1 message

sbazzarre@budgetemllc.com <sbazzarre@budgetemllc.com>

Thu, Sep 6, 2018 at 1:53 PM

To: airdivision1@deq.virginia.gov Cc: sbazzarre@budgetemllc.com

To whom it may concern,

Please consider my letter urging approval of the air quality permit for the Buckingham Compressor Station of the Atlantic Coast Pipeline. Unfortunately, I will not be able to make it to the local hearing in Buckingham on September 11th to speak to you in person. I have a previous business engagement for my company that I cannot reschedule. Thanks for you time on this critical matter.

Best regards,

#### **Scott Bazzarre**

President

Budget Electrical & Mechanical, LLC

Office: (434) 510-7043

Cell: (434) 989-2775

Email: <u>sbazzarre@budgetemllc.com</u>



Website: www.budgetemllc.com

Palmyra, Virginia

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# Budget Electrical & Mechanical, LLC 13610 James Madison Highway Palmyra, VA 22963 (434) 510-7043

To: Virginia Air Control Board

RE: Buckingham Compressor Station permit approval (for the Atlantic Coast Pipeline)

Date: 9/6/2018

Hello,

I wish to urge approval for the Buckingham Compressor Station air quality control permit for the Atlantic Coast Pipeline. With the pipeline construction process proceeding, this permit approval is critical to making this entire project operate correctly. Without this central compressor station being operational at near full capacity, the flow of natural gas in this 42" conduit will not work properly, essentially stopping the entire project and the critical energy we need to heat our homes and to be competitive in attracting large business to the central Virginia region. Without the coal fired plants to provide this energy to central Virginia, the Atlantic Coast Pipeline will be necessary to adequately supply the energy we need for our area. The added benefit of this natural gas pipeline is that it is much cleaner than coal and can supply our baseline energy needs until newer and cleaner sources of energy can be developed and made cost effective on a large scale.

We presently have around 24 power stations operated by Dominion in the Commonwealth of Virginia that do not operate with nuclear power as the energy source. Of these power stations, approximately one half are presently operated using natural gas to supply fuel to the generators to generate our power. The rest use various oils or diesel fuel, biomass, coal or coke, and wood to accomplish our energy creation. To a lesser extent, we also use solar power and wind, of which solar power is our hope for the future, but at present we are not technologically capable of providing the power generation we need on a massive scale to satisfy our present and future needs. Nuclear power should also be considered, but since the building of the Surry and North Anna Nuclear Power Stations about 40 years ago, no more serious efforts have been put forward to use this energy generation source. Right now, natural gas is our best bet for providing massive power generation while still trying to protect the environment around us.

Although a power station and a compressor station are somewhat different in their actual function to the utility they serve, my point is that Dominion Virginia Power is thoroughly familiar with generators and compressors using natural gas to provide their end use means. DVP is very safety conscious and is as environmentally conscious as a power company can be. Natural gas compressors are as clean on their emissions as you get to generate power on such a large scale unless you consider using nuclear power.

This compressor station in Dillwyn will also provide jobs during construction and for the lifetime of the pipeline. Once again, DVP is as maintenance conscious as any corporate entity in the United States. That means they will generate more than just power for our area. They will supply jobs and additional income for subcontractors and vendors for years to come. The odds are we will also see lower energy bills for those of us that live and work in the area. As far as I can see, we all win with this project.

Please approve this permit after carefully reviewing the job plans and specifications. It will certainly help all of us in the long run.

Thanks so much,

Scott Bazzarre President Budget Electrical & Mechanical, LLC

13610 James Madison Highway
Palmyra, VA 22963



# Virginia Chamber of Commerce Public Comments - Buckingham Compressor Station

1 message

Nicole Bunce <n.bunce@vachamber.com>

Thu, Sep 6, 2018 at 4:58 PM

To: "airdivision1@deq.virginia.gov" <airdivision1@deq.virginia.gov>

Cc: "Martin, Keith" <k.martin@vachamber.com>, Kim McKay <k.mckay@vachamber.com>

Good Afternoon,

I hope this email finds you well. My name is Nicole Bunce and I serve as the public policy coordinator for the Virginia Chamber of Commerce. On behalf of the Virginia Chamber, please see the attached letter for our public comments regarding the Buckingham Compressor Station. Should you need anything further please let us know. If possible, please confirm receipt of this email for our records.

Thank you for your time and consideration.

Best Regards,

Nicole Bunce

#### **Nicole Bunce**

**Public Policy Coordinator** 

Virginia Chamber of Commerce

919 E. Main St., Suite 900

Richmond, VA 23219

Direct: 804-237-1454

Mobile: 804-350-3083

n.bunce@vachamber.com

www.vachamber.com





September 4, 2018

Virginia Department of Environmental Quality Piedmont Regional Office 4949-A Cox Road Glen Allen, VA 23060

RE: Buckingham Compressor Station

Dear Department of Environmental Quality:

The Virginia Chamber of Commerce is the largest business advocacy organization in the Commonwealth with more than 26,000 members. The Virginia Chamber recently released *Blueprint Virginia 2025*, a comprehensive business plan for the Commonwealth which outlines the business community's priorities and recommendations for making Virginia the best state for business. The Virginia Chamber of Commerce has long supported the development of infrastructure that will increase access to affordable, reliable natural gas in all parts of Virginia for manufacturing, power generation, and home heating.

As you are aware, the Buckingham Compressor Station is an integral part of the Atlantic Coast Pipeline – a project the Virginia Chamber of Commerce has strongly supported. We believe it is well aligned to our energy goals in *Blueprint Virginia 2025*, and will help enable economic growth throughout the Commonwealth.

We believe that environmental protection and energy independence are compatible and complementary goals to achieving economic growth. The Virginia Chamber is appreciative of the Department of Environmental Quality's thoroughness and dedication in reviewing the ACP's environmental impacts and the agency's willingness to take strong steps to ensure those impacts are held to an absolute minimum. This is evident in the draft air permit with the inclusion of strict emissions limits and control technology.

Although the station is classified under federal and state regulations as a "minor" source of emissions, we've heard the limits included in the draft permit are much more typical of those imposed on larger facilities with much higher emissions levels. These limits apply to regulated emissions ranging from nitrogen oxides to volatile organic compounds to carbon monoxide. Limits such as these will help ensure that Virginia's air remains clean and healthy even as we continue to build our energy infrastructure.

Again, the control technology required by the draft permit are more typical of those mandated for much larger facilities with higher levels of emissions. The systems included in the draft permit cover an impressive range from selective catalytic reduction to as vent gas recovery system designed to minimize the release of natural gas into the atmosphere. We are confident that the developers will carry out the permit's strong requirements for air quality protection.

The Department of Environmental Quality has worked hard for many years to ensure that future generations of Virginians will have clean water and air. We applaud you for continuing that work through the terms and conditions in the draft Buckingham air permit. And the Virginia Chamber of Commerce, again, thanks you for the opportunity to offer our comments on this important regulatory matter.

Best regards.

Barry E. DuVal

President and CEO



## The ACP is safe and necessary

1 message

Wendy Evans < Wendy. Evans. 108978520@p2a.co> Reply-To: wendy.evans@dominionenergy.com To: Ann Regn <airdivision1@deq.virginia.gov>

Thu, Sep 6, 2018 at 7:48 AM

Dear Director Ann Regn,

Doing the right thing for our communities, our economy, and our environment is a balancing act. That's why a project as important as the Atlantic Coast Pipeline isn't built overnight. Rather, this project has gone through more than three years of careful planning and thorough scrutiny from agencies and organizations at every level.

Because of that exhaustive planning, the ACP is the safest way for us to get affordable, cleaner natural gas to those in our region who desperately need it.

The Buckingham Compressor Station is an integral part of the ACP project. The compressor station's "best in class" engineering design, and advanced emissions control equipment will ensure the facility will fully protect Virginia's air quality. In fact, modeling has demonstrated that the station's emissions, even when the facility is operating at its maximum, will not adversely impact Virginia's air quality. The modeling was conducted using methods approved by DEQ and has proven reliable thus far.

I believe that the stringency of the air quality permit that the ACP project has already passed will keep our community safe—while still allowing us to move forward with producing cleaner and more affordable American energy.

Accordingly, in the case of the recent discussions by the State Water Control Board regarding the state's use of the Army Corps of Engineers Nationwide Permit 12, I believe revisiting the existing process would be a mistake.

Our state's environment and our business climate have prospered from a consistent, predictable regulatory climate and from federal and state partnerships to allow scarce regulatory resources to be put to optimal use. There is no need to change the current approach.

Sincerely, Wendy Evans 11612 Alder Ridge Ct Glen Allen, VA 23059



#### **Buckingham Compressor Station Air Permit**

1 message

Thomas Gannon (constructionbydesign@embarqmail.com) Sent You a Personal Message <automail@knowwho.com>To: airdivision1@deg.virginia.gov

Thu, Sep 6, 2018 at 8:29 AM

Dear Ann Regn

Way past time to put fossil fuel behind us and start repairing the damage we have done.

I am writing to request that you deny the Stationary Source Permit to Construct and Operate Dominion Energy's proposed Buckingham fracked-gas compressor station as it is inadequate to protect the air quality and public health of Virginians. The permit is particularly inadequate to protect the Virginians in the Union Hill and overall Buckingham County communities that will be most directly impacted by the compressor station's operation.

A compressor station of this scale is unprecedented in Virginia. The proposed compressor station would be the largest in Virginia's history. Despite this, the draft permit does not contain sufficient analysis of impacts on the community and how impacts will be mitigated. The draft permit does not sufficiently explain how the compressor station will impact the community or why the standards and methodologies it relies on to analyze impacts are enough to protect human health.

- In the analysis of the draft permit, the Virginia Department of Environmental Quality states, based on a 2017 evaluation, that the proposed site for the compressor station is "sparsely populated". However, research done by community groups indicates that this is absolutely not true and that there are hundreds of Virginians living close to the site.
- Some residents live as close as half a mile from the proposed compressor station site. Evidence shows people living near compressor stations have suffered from symptoms ranging from rashes to gastrointestinal, respiratory, neurological and psychological problems. The draft permit does not explain how the air quality and health of these especially vulnerable residents will be protected over time from harmful air emissions.
- The draft permit will require mostly self-monitoring by Dominion of air quality and emissions. It does not explain why installing further community monitoring technology is unnecessary to protect air quality and human health.
- A Quantitative Risk Assessment and Comprehensive Health Impact Assessment should be conducted to address the complex and multifaceted ways that the health of residents could be impacted by emissions from the compressor station.
- No mention of how air quality emergencies will impact the community or be mitigated is included in the draft permit.
- While greenhouse gas emissions are briefly mentioned, there is no analysis of how measures established in the draft permit will ensure that air quality and human health will be protected from climate change impacts.

Virginians rely on the expertise of public officials like those on the Air Board to ensure their health and environment is protected. It is imperative that the deficiencies noted above are addressed so that the comprehensive impacts on air quality and the health of Virginians can be adequately considered and addressed before a permit is issued.

For these reasons, I respectfully request that the Air Board deny Dominion's permit for the Buckingham Compressor Station.

Sincerely

Thomas Gannon 14440 Mill Creek Dr Montpelier, VA 23192 constructionbydesign@embarqmail.com (804) 883-3187

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.



## **Extend Comment Period for the Buckingham Compressor Air Permit**

1 message

**Kidest Gebre** <kidestgebre@gmail.com> Reply-To: kidestgebre@gmail.com To: airdivision1@deq.virginia.gov Thu, Sep 6, 2018 at 2:37 PM

The concept of "tzedek" comes from the Jewish faith tradition, calling for justice and equity among all people. The vision of tzedek is one of environmental justice and clean and safe air for all to breathe. The proposed Atlantic Coast Pipeline (ACP) compressor station violates this concept as it would expose residents in Union Hill and Buckingham County to leaking pollutants such as methane gas, formaldehyde, benzene, arsenic, uranium and additional toxic volatile organic compounds (VOCs).

This 54,000+ horsepower compressor station is one of the largest that Dominion has ever built and the largest in Virginia, further endangering health of residents and increasing risk and vulnerability. Having clean air is a fundamental human right and is especially vital for children and the elderly, some of the most vulnerable to the negative impacts of inhaling pollutants.

Many of the world's major faith traditions have a mandate to care for the Earth. By doing so, we care for each other. I submit this comment with love to express my solidarity with the community of Buckingham and their health and safety concerns stemming from the construction and operation of this massive compressor station.

I urge the VA State Air Pollution Control Board and the Department of Environmental Quality (DEQ) to extend the 30-day comment period to at least 60 days, to ensure meaningful participation by impacted populations in permitting and monitoring, and to immediately complete a thorough Quantitative Risk Assessment (QRA) and a Comprehensive Health Impact Assessment (CHIA) prior to any future permitting.

I further urge the VA State Air Pollution Control Board and the DEQ to abide by the principles of environmental justice as the compressor station is proposed to be sited in Buckingham County's historic Union Hill, an 85% African American community. It is unacceptable that our society continues to disproportionately burden the poor and people of color with increased levels of dangerous air pollution.

Being unable to take a deep breath of clean air to pray or meditate at the many nearby religious sites such as Union Hill and Union Grove Churches and the LOTUS Temple, one of the many sacred places in Satchidananda Ashram Yogaville, is an egregious violation of humanity.

The risks to our sacred gift of air posed by Dominion's proposed ACP compressor station are simply too high.

Ms. Kidest Gebre 28 Westhampton Way 28 WESTHEMPTON WAY Richmond, VA 23173 2028482909



# **Buckingham Compressor Station comment attached**

1 message

Hanuman <kendahanuman@gmail.com> Reply-To: kendahanuman@gmail.com To: airdivision1@deq.virginia.gov

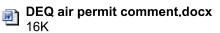
Thu, Sep 6, 2018 at 10:44 AM

Cc: michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov

Dear DEQ and Air Board Members,

Please find my comment attached. I'm submitting this after four years of inquiry into how the proposed Atlantic Coast Pipeline would would affect us here in our rural, heart of Virginia.

Sincerely, Kenda Hanuman



To: Virginia Department of Environmental Quality and Air Board Members

Re: Atlantic Coast Pipeline, 21599, Buckingham Compressor Station

I live in a health-retreat community in the heart of Virginia. Thousands of people come from around the world to this pristine, rural location for its clean air and water, and our generally healthy environment.

If the 54,000+ hp Buckingham Compressor Station were to be built, this community would be five miles downwind of the hundreds of tons of pollutants it would emit yearly. Not only would this be an enormous detriment to the economy here, but it would impact the densely populated neighborhood of several hundred full-time residents.

We stand with our neighbors in the Union Hill neighborhood, as covered in the Washington Post article, <a href="http://tinyurl.com/ycwcye8s">http://tinyurl.com/ycwcye8s</a>, asking that this industrial facility permit be denied.

How do you rationalize approving such a development when your mission states:

# **DEQ's Mission**

Virginia's diverse geography and abundant natural resources benefit agriculture, industry and commerce and provide a rich environment for people, plants and wildlife. To ensure the continued vitality of what the Commonwealth has to offer, the mission of the Department of Environmental Quality is to protect and improve the environment for the well-being of all Virginians.

I hope you will at the very least:

- 1. Give your Virginia citizens a minimum of a 30-day extension of the comment period to allow for a more thorough review of the permit application details.
- 2. Correct the fractured permitting process by:

Conducting a **complete** Quantified Risk Assessment (QRA) for the Buckingham Compressor Station prior to permitting, and working with other state agencies to conduct a Health Risk Assessment (HRA) and a Health Impact Assessment (HRI).

Sincerely,

Kenda Hanuman

247 Ramaa Lane

Buckingham, VA

434-969-1586



# **Buckingham Compressor Station- Air Permit- Comments**

1 message

**Mary Hensley** <MHensley@enspireenergy.com>
To: "airdivision1@deq.virginia.gov" <airdivision1@deq.virginia.gov>

Thu, Sep 6, 2018 at 8:42 AM

Good morning:

Please see our attached comments concerning approval for the air quality permit for the Buckingham Compressor Station. Thanks so much for the opportunity to submit comments.

Mary Hensley

**Director of Marketing** 

Phone: 757-963-9123

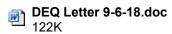
Fax: 757-963-9133

Email: mhensley@enspireenergy.com



134 N. Battlefield Blvd

Chesapeake, VA 23320





September 6, 2018

Virginia Department of Environmental Quality Piedmont Regional Office 4949-A Cox Road Glen Allen, VA 23060

RE: Buckingham Compressor Station

Dear Department of Environmental Quality:

On behalf of Enspire Energy, I appreciate this opportunity to submit our comments on the draft air quality permit for the Buckingham Compressor Station. As you know, the station is an integral part of the Atlantic Coast Pipeline, and Enspire Energy, along with many other members of the Commonwealth's business community, have strongly supported the project. We believe our state's continued economic health and growth depends upon a secure, reliable and affordable supply of energy. The pipeline is a key to achieving that goal.

However, Enspire Energy could not support the project, no matter how attractive it might be from an energy standpoint, if we felt it had the potential to damage Virginia's environment. Fortunately, we have no such concerns. We are impressed by the developers' commitment to protecting our natural resources. We are equally impressed with the thoroughness and dedication your department has brought to reviewing the ACP's environmental impacts and your willingness to take strong steps to ensure those impacts are held to an absolute minimum. You have shown that same dedication in developing the draft air permit.

We are very pleased with the strict emissions limits included in the draft. Although the station is classified under federal and state regulations as a "minor" source of emissions, we are told that the limits included in the draft permit are much more typical of those imposed on larger facilities with much higher emissions levels. In fact, we understand that the limits in the draft Buckingham permit are four to 10 times stricter than the limits in any other permit recently issued for compressor stations in Virginia. These stringent limits apply to regulated emissions ranging from nitrogen oxides to volatile organic compounds to carbon monoxide, and they will help ensure that Virginia's air remains clean and healthy even as we expand our energy infrastructure.

Additionally, we are impressed by the control technology required by the draft permit. Here again, these controls are more typical of those mandated for much larger facilities with higher levels of emissions. The systems included in the draft permit cover an impressive range from selective catalytic reduction to as vent gas recovery system designed to minimize the release of natural gas into the atmosphere. We are confident that the developers will carry out the permit's strong requirements for air quality protection.



The Department of Environmental Quality has worked hard for many years to ensure that future generations of Virginians will have clean water and air. We applaud you for continuing that work through the terms and conditions in the draft Buckingham air permit. And Enspire Energy again thanks you for the opportunity to offer our comments on this important regulatory matter.

Sincerely,

Mary Hensley

Director of Marketing

May K. Hery

Enspire Energy Ph: 757-963-9123

Email: mhensley@enspireenergy.com



## Fwd: ACP Union Hill Compressor Station

1 message

**William Limpert** <wflimpert@gmail.com>
To: airdivision1@deq.virginia.gov

Thu, Sep 6, 2018 at 4:10 PM

Sorry I messed up the address on the earlier e-mail...

Begin forwarded message:

From: William Limpert <wflimpert@gmail.com>
Subject: ACP Union Hill Compressor Station
Date: September 6, 2018 at 4:05:16 PM EDT

To: airdivision1@deqvirginia.gov, michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov

DEQ Staff:

I urge you to reject a permit for the Atlantic Coast Pipeline compressor station in Union Hill, Buckingham County.

I am not an air quality expert, nor am I a specialist regarding compressor stations. Nevertheless, no matter how you crunch the numbers, or manipulate the data, there is no question that the compressor station would be detrimental to the health of nearby residents. Any professional will tell you that, and I am sure that you are aware of that.

The residents of Union Hill are mostly older, and many are not in the best of health. The emissions from the compressor station would only exacerbate their existing conditions, as would the stress of having an invasive industrial facility forced upon their bucolic rural community.

Let me briefly relay a tragic story from testimony at the National Press Club in Washington, DC in which I also spoke against abuses to the public from the Federal Energy Regulatory Commission.

A firefighter in New York City responded to the terrorist attack on the twin towers on 9/11. He rescued a number of people, and survived the attack, but suffered lung damage. His doctor advised him to leave New York City to protect his fragile lungs from the big city air pollution. He moved out in the country to upstate New York. Shortly after buying a home there, plans were announced to build a natural gas compressor station next to his home, and the plant was built. His doctor advised him to move again.

The residents of Union Hill will probably not be able to move away from this toxic facility. Even if they could, they would receive little for their home due to a great loss in property value from the compressor station. What has likely been the biggest investment of their lives would become the biggest loss of their lives.

Additionally, this community is not equipped to understand the complexities of scientific documents regarding the compressor station that were recently presented to them in such a short period of time. They need additional time and help to do so. The comment period for this proposed permit needs to be extended at least an additional 30 days for them to have an equal opportunity to understand the complex issues involved, and to respond meaningfully.

I understand that you are under great pressure from the ACP, Governor Northam, and senior staff at DEQ to approve this permit. Do not relent to that pressure. Be true to your mission as public servants to truly serve the public. The public does not want this compressor station, and you should reject it.

Thank you,

William F. Limpert



## The ACP is safe and necessary

1 message

Ann Miller < Ann. Miller. 51621771@p2a.co> Reply-To: uptocountry@aol.com To: Ann Regn <airdivision1@deq.virginia.gov> Thu, Sep 6, 2018 at 1:54 AM

Dear Director Ann Regn,

Doing the right thing for our communities, our economy, and our environment is a balancing act. That's why a project as important as the Atlantic Coast Pipeline isn't built overnight. Rather, this project has gone through more than three years of careful planning and thorough scrutiny from agencies and organizations at every level.

Because of that exhaustive planning, the ACP is the safest way for us to get affordable, cleaner natural gas to those in our region who desperately need it.

The Buckingham Compressor Station is an integral part of the ACP project. The compressor station's "best in class" engineering design, and advanced emissions control equipment will ensure the facility will fully protect Virginia's air quality. In fact, modeling has demonstrated that the station's emissions, even when the facility is operating at its maximum, will not adversely impact Virginia's air quality. The modeling was conducted using methods approved by DEQ and has proven reliable thus far.

I believe that the stringency of the air quality permit that the ACP project has already passed will keep our community safe—while still allowing us to move forward with producing cleaner and more affordable American energy.

Accordingly, in the case of the recent discussions by the State Water Control Board regarding the state's use of the Army Corps of Engineers Nationwide Permit 12, I believe revisiting the existing process would be a mistake.

Our state's environment and our business climate have prospered from a consistent, predictable regulatory climate and from federal and state partnerships to allow scarce regulatory resources to be put to optimal use. There is no need to change the current approach.

Sincerely, Ann Miller 180 Persimmon Tree Lane Gore, VA 22637



## The ACP is safe and necessary

1 message

Richard Nygaard < Richard Nygaard .15481731@p2a.co> Reply-To: one immortal@msn.com To: Ann Regn <airdivision1@deq.virginia.gov>

Thu, Sep 6, 2018 at 9:54 PM

Dear Director Ann Regn,

Doing the right thing for our communities, our economy, and our environment is a balancing act. That's why a project as important as the Atlantic Coast Pipeline isn't built overnight. Rather, this project has gone through more than three years of careful planning and thorough scrutiny from agencies and organizations at every level.

Because of that exhaustive planning, the ACP is the safest way for us to get affordable, cleaner natural gas to those in our region who desperately need it.

The Buckingham Compressor Station is an integral part of the ACP project. The compressor station's "best in class" engineering design, and advanced emissions control equipment will ensure the facility will fully protect Virginia's air quality. In fact, modeling has demonstrated that the station's emissions, even when the facility is operating at its maximum, will not adversely impact Virginia's air quality. The modeling was conducted using methods approved by DEQ and has proven reliable thus far.

I believe that the stringency of the air quality permit that the ACP project has already passed will keep our community safe—while still allowing us to move forward with producing cleaner and more affordable American energy.

Accordingly, in the case of the recent discussions by the State Water Control Board regarding the state's use of the Army Corps of Engineers Nationwide Permit 12, I believe revisiting the existing process would be a mistake.

Our state's environment and our business climate have prospered from a consistent, predictable regulatory climate and from federal and state partnerships to allow scarce regulatory resources to be put to optimal use. There is no need to change the current approach.

Sincerely, Richard Nygaard 16655 Macnaughton Ct Purcellville, VA 20132



# **ACP Buckingham Compressor Station**

1 message

 Thu, Sep 6, 2018 at 11:16 AM

Ryan K. Palazzo

Vice President

U.S. Pipeline, Inc.

303-842-4151

rpalazzo@uspipeline.com





September 6, 2018

Virginia Department of Environmental Quality Piedmont Regional Office 4949-A Cox Road Glen Allen, VA 23060

RE: Buckingham Compressor Station

Dear Department of Environmental Quality:

On behalf of U.S. Pipeline, Inc. (USPL), I appreciate this opportunity to submit our comments on the draft air quality permit for the Buckingham Compressor Station. As you know, the station is an integral part of the Atlantic Coast Pipeline (ACP), and along with many other members of the Commonwealth's business community, we have strongly supported the project. We believe our country and your state's continued economic health and growth depends upon a secure, reliable and affordable supply of energy. The pipeline is a key to achieving that goal.

However, USPL could not support the project, no matter how attractive it might be from an energy standpoint, if we felt it had the potential to damage the environment. Fortunately, we have no such concerns. We are impressed by the developers' commitment to protecting our natural resources. We are equally impressed with the thoroughness and dedication your department has brought to reviewing the ACP's environmental impacts and your willingness to take strong steps to ensure those impacts are held to an absolute minimum. You have shown that same dedication in developing the draft air permit.

We are very pleased with the strict emissions limits included in the draft. Although the station is classified under federal and state regulations as a "minor" source of emissions, we are told that the limits included in the draft permit are much more typical of those imposed on larger facilities with much higher emissions levels. In fact, we understand that the limits in the draft Buckingham permit are four (4) to ten (10) times more strict than the limits in any other permit recently issued for compressor stations in Virginia. These stringent limits apply to regulated emissions ranging from nitrogen oxides to volatile organic compounds to carbon monoxide, and they will help ensure that Virginia's air remains clean and healthy even as we expand our energy infrastructure.

Additionally, we are impressed by the control technology required by the draft permit. Here again, these controls are more typical of those mandated for much larger facilities with higher

levels of emissions. The systems included in the draft permit cover an impressive range from selective catalytic reduction to as vent gas recovery system designed to minimize the release of natural gas into the atmosphere. We are confident that the developers will carry out the permit's strong requirements for air quality protection.

The Department of Environmental Quality has worked hard for many years to ensure that future generations of Virginians will have clean water and air. We applaud you for continuing that work through the terms and conditions in the draft Buckingham air permit. And USPL again thanks you for the opportunity to offer our comments on this important regulatory matter.

Sincerely,

Ryan Palazzo

Vice President



## Comment on air permit application for the proposed Buckingham compressor station

1 message

Christiane Riederer von Paar < criederer 1008@me.com>

Thu, Sep 6, 2018 at 6:11 PM

To: airdivision1@deq.virginia.gov

Cc: michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov

Dear Air pollution Control Board and DEQ,

1) The 30 day public comment period given for the air permit for the Union Hill Compressor Station is woefully inadequate considering the complexity and technical language of the permitting documents released in August and the broad concerns of health, well being and indeed lives of the community of Union Hill. The information meeting on August 16 was inadequate in clarifying the technical aspects and absurdly limited in its scope of real questions that were allowed:

Repeatedly important questions were dismissed as not being within the parameters of "Air Quality". How can you talk about air quality and the impact of the Air compressor station without considering the particulate matters and like that travel through the air and land on nearby sensitive wetlands, or the noise pollution that travels through the air and causes very real stress and health issues to the people and animals, or the radon contaminated sludge that gets pushed out through the periodic cleaning or 'pigging' of the pipes? How will this be disposed of? What monitoring and warning systems are there for the air quality? (none) - the closest is in Charlottesville. How will residents know if there is a potentially explosive leak without odor added to the gas or real on site 24hr monitoring (as opposed to remote computer monitoring)? You are basing your figures entirely on computer modulated outcomes based on stations much smaller than this one - where are the real life comparisons? There aren't any. You are risking the lives of this entire community on an realtime experiment!

2) The Department of Environmental Quality must immediately complete a Quantified Risk Assessment (QRA) for the Buckingham Compressor Station prior to permitting and to work with other state agencies to conduct a Health Risk Assessment (HRA) and a Health Impact Assessment (HRI).

So many questions and concerns but it all boils down to this whole process being fragmented and flawed from its inception. The Permit must be denied.

Thank you for your consideration,

Christiane Riederer

1008 South Center Street

Ashland, VA 23005



## **Deny the Buckingham Compressor Station Air Permit**

1 message

**David Savige** <dsavige@verizon.net> Reply-To: dsavige@verizon.net To: airdivision1@deq.virginia.gov Thu, Sep 6, 2018 at 1:44 PM

I urge the VA State Air Pollution Control Board and the Department of Environmental Quality (DEQ) to deny the air pollution permit for the Atlantic Coast Pipeline (ACP) compressor station being proposed in Buckingham County This 54,000 horsepower compressor station is one of the largest ever proposed by Dominion Energy and it threatens the health of this majority-black community that has loudly resisted the project since it was first announced. I also urge state regulators to immediately complete a thorough risk assessment prior to any permitting and work with other state agencies to conduct health risk and comprehensive health impact assessments at the beginning of future permitting processes.

In Section X of DEQ's Intra-Agency Memorandum analyzing the draft permit, it states that a 10/31/2017 site evaluation led the agency to conclude the area surrounding the site was "sparsely populated." However, research done by community groups indicates that numerous residents live close to the site who would be in danger in the event of an emergency.

This compressor station represents a direct threat to our climate, but more importantly, it serves as a direct attack on the livelihoods of the residents of Buckingham County's historic Union Hill, an 85% African American community. This community has been the home of some of America's first freedmen and remains the home of may of their descendants: placing a compressor station that is capable of spewing toxic levels of methane, nitrous oxides, particulate matter and other volatile organic compounds just miles from their homes and schools is nothing short of environmental racism. This large community is also at risk of extreme imminent danger stemming from any emergencies at the the compressor station. To avoid another situation like this, I also urge the State Air pollution Control Board and DEQ to consider environmental justice in all future permitting decisions.

The DEQ and Air Pollution Control Board have a unique and critical responsibility to protect our most vulnerable citizens from the dangers of fossil fuel pollution. In order to fulfil your duty as our state regulators, you must deny the air permits for these projects and protect this vibrant community.

Mr. David Savige 5661 Craneybrook Ln Portsmouth, VA 23703 7576863953



## **Buckingham Compressor Station, 4040-A**

1 message

**karen spurr** <klspurr1a@gmail.com> To: airdivision1@deq.virginia.gov Thu, Sep 6, 2018 at 1:11 AM

The ACP Compressor Station at Union Hill is a grave example of environmental racism. A compressor station operates 24/7 to move fracked gas through a pipeline, emitting air and noise pollution and harming the health of community members nearby. This community should not have to bear the burden and risk of this dirty compressor station for an unnecessary pipeline project



## **Deny the Buckingham Compressor Station Air Permit**

1 message

Ben Bressette <ben.bressette@icloud.com> Reply-To: ben.bressette@icloud.com To: airdivision1@deq.virginia.gov

Thu, Sep 6, 2018 at 7:55 AM

I urge the VA State Air Pollution Control Board and the Department of Environmental Quality (DEQ) to deny the air pollution permit for the Atlantic Coast Pipeline (ACP) compressor station being proposed in Buckingham County This 54,000 horsepower compressor station is one of the largest ever proposed by Dominion Energy and it threatens the health of this majority-black community that has loudly resisted the project since it was first announced. I also urge state regulators to immediately complete a thorough risk assessment prior to any permitting and work with other state agencies to conduct health risk and comprehensive health impact assessments at the beginning of future permitting processes.

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Ben Bressette 43750 Crane Ct Ashburn, VA 20147 7039391324



## **Deny the Buckingham Compressor Station Air Permit**

1 message

Denise Curry < Demise.curry@sndden.org > Reply-To: Demise.curry@sndden.org To: airdivision1@deq.virginia.gov

Thu, Sep 6, 2018 at 7:27 AM

I urge the VA State Air Pollution Control Board and the Department of Environmental Quality (DEQ) to deny the air pollution permit for the Atlantic Coast Pipeline (ACP) compressor station being proposed in Buckingham County This 54,000 horsepower compressor station is one of the largest ever proposed by Dominion Energy and it threatens the health of this majority-black community that has loudly resisted the project since it was first announced. I also urge state regulators to immediately complete a thorough risk assessment prior to any permitting and work with other state agencies to conduct health risk and comprehensive health impact assessments at the beginning of future permitting processes.

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This compressor station represents a direct threat to our climate, but more importantly, it serves as a direct attack on the livelihoods of the residents of Buckingham County's historic Union Hill, an 85% African American community. This community has been the home of some of America's first freedmen and remains the home of may of their descendants: placing a compressor station that is capable of spewing toxic levels of methane, nitrous oxides, particulate matter and other volatile organic compounds just miles from their homes and schools is nothing short of environmental racism. This large community is also at risk of extreme imminent danger stemming from any emergencies at the the compressor station. To avoid another situation like this, I also urge the State Air pollution Control Board and DEQ to consider environmental justice in all future permitting decisions.

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Ms. Denise Curry 305 Cable st Baltimore, MD 21210 2025384222



## **Deny the Buckingham Compressor Station Air Permit**

Quinci Cuthbert <quinci.cuthbert@gmail.com> Reply-To: quinci.cuthbert@gmail.com To: airdivision1@deq.virginia.gov

Thu, Sep 6, 2018 at 1:46 PM

I urge the VA State Air Pollution Control Board and the Department of Environmental Quality (DEQ) to deny the air pollution permit for the Atlantic Coast Pipeline (ACP) compressor station being proposed in Buckingham County This 54,000 horsepower compressor station is one of the largest ever proposed by Dominion Energy and it threatens the health of this majority-black community that has loudly resisted the project since it was first announced. I also urge state regulators to immediately complete a thorough risk assessment prior to any permitting and work with other state agencies to conduct health risk and comprehensive health impact assessments at the beginning of future permitting processes.

In Section X of DEQ's Intra-Agency Memorandum analyzing the draft permit, it states that a 10/31/2017 site evaluation led the agency to conclude the area surrounding the site was "sparsely populated." However, research done by community groups indicates that numerous residents live close to the site who would be in danger in the event of an emergency.

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Ms. Quinci Cuthbert 18 S. Addison st. Richmond, VA 23220 7039454866



## **Deny the Buckingham Compressor Station Air Permit**

Molly Garrett <skreenstar@comcast.net> Reply-To: skreenstar@comcast.net To: airdivision1@deq.virginia.gov

Thu, Sep 6, 2018 at 10:21 AM

I urge the VA State Air Pollution Control Board and the Department of Environmental Quality (DEQ) to deny the air pollution permit for the Atlantic Coast Pipeline (ACP) compressor station being proposed in Buckingham County This 54,000 horsepower compressor station is one of the largest ever proposed by Dominion Energy and it threatens the health of this majority-black community that has loudly resisted the project since it was first announced. I also urge state regulators to immediately complete a thorough risk assessment prior to any permitting and work with other state agencies to conduct health risk and comprehensive health impact assessments at the beginning of future permitting processes.

In Section X of DEQ's Intra-Agency Memorandum analyzing the draft permit, it states that a 10/31/2017 site evaluation led the agency to conclude the area surrounding the site was "sparsely populated." However, research done by community groups indicates that numerous residents live close to the site who would be in danger in the event of an emergency.

This compressor station represents a direct threat to our climate, but more importantly, it serves as a direct attack on the livelihoods of the residents of Buckingham County's historic Union Hill, an 85% African American community. This community has been the home of some of America's first freedmen and remains the home of may of their descendants: placing a compressor station that is capable of spewing toxic levels of methane, nitrous oxides, particulate matter and other volatile organic compounds just miles from their homes and schools is nothing short of environmental racism. This large community is also at risk of extreme imminent danger stemming from any emergencies at the the compressor station. To avoid another situation like this, I also urge the State Air pollution Control Board and DEQ to consider environmental justice in all future permitting decisions.

The DEQ and Air Pollution Control Board have a unique and critical responsibility to protect our most vulnerable citizens from the dangers of fossil fuel pollution. In order to fulfil your duty as our state regulators, you must deny the air permits for these projects and protect this vibrant community.

Miss. Molly Garrett Floyd Ave. Richmond, VA 23221 ?(804) 464-8956?



## Deny the Buckingham Compressor Station air permit

1 message

Donna Gasapo <gasapo@juno.com> Reply-To: gasapo@juno.com To: airdivision1@deq.virginia.gov

Thu, Sep 6, 2018 at 4:52 PM

Director of Publ

State Air Pollution Control Board c/o Ann Regn, Director of Public Information and Outreach Virginia Department of Environmental Quality Phone: 804-698-4442

Email: airdivision1@deq.virginia.gov

Fax: 804-527-5106

Dear Director Paylor and members of the Air Pollution Control Board,

I respectfully urge you to deny the draft minor source air permit for the Atlantic Coast Pipeline's Buckingham Compressor Station.

This compressor station poses a direct threat to our climate, our air quality, and - most importantly - to the lives of the historic freedman and largely African American Union Hill community. If built, the compressor station would emit methane, nitrogen oxides, volatile organic compounds and particulate matter into the air in close range to community members' homes and would be a stark example of environmental racism at play in the Commonwealth.

We ask that you deny this permit and request that the following concerns be addressed:

- DEQ and the Air Board must ensure that the permit for the Buckingham Compressor Station does not disproportionately impact marginalized communities. However, the vast majority of residents in close proximity to the proposed compressor station site - 85% - are people of color, and a large proportion are elderly or very young. Therefore, a disproportionate impact on an environmental justice community is virtually guaranteed. If the project cannot be modified to avoid this outcome, the air permit should be denied.
- ACP has not shown that the amount of toxic air emissions from the compressor will not cause or contribute to the endangerment of human health. DEQ should conduct a baseline Health Impact Assessment to better understand what ailments already exist in the community that could be exacerbated by these emissions. The elderly, very young, and community members who already have respiratory health issues are particularly at risk.
- DEQ should require ACP to continuously monitor nitrogen oxide emissions to ensure ACP is complying with the nitrogen oxide emissions limits at all operating periods. The currently proposed stack testing is not sufficient to ensure compliance with the draft permit conditions.
- DEQ should conduct further analysis of the greenhouse gas emissions associated with this proposed compressor station. While Virginia is poised to begin regulating carbon dioxide emissions from electric power plants, ignoring the greenhouse gas emissions from the infrastructure used to supply those power plants is self-defeating. With each new pipeline and compressor station built, significant amounts of methane are emitted into the atmosphere, exacerbating climate change impacts. Though methane does not last in the atmosphere nearly as long as carbon dioxide, methane is much more efficient at capturing radiation than carbon dioxide and, pound for pound, the comparative impacts of methane to carbon dioxide are 25 times greater over a 100 year period. Greenhouse gas emissions are mentioned in the draft air permit, but further analysis of impacts and plans to mitigate those emissions are necessary.
- · ACP has not adequately addressed emergency response plans. Detailed plans should be drafted and shared with the community. These plans should outline evacuation and actions in response to an explosion or other emergency at the Buckingham compressor station. At this time, there is no certainty that residents could be evacuated promptly, and Buckingham County emergency responders do not have the supplies or resources to respond to a significant industrial emergency.

It is extremely important that the Air Pollution Control Board defend Union Hill, Buckingham County, and all Virginians' air and climate from the harmful impacts associated with this compressor station. I urge you to deny the permit.

Sincerely,

Donna Gasapo 117 Doncaster Lane Charlottesville, VA 22903 7576131985



## **Deny the Buckingham Compressor Station Air Permit**

1 message

Caroline Pruett <karabair@gmail.com> Reply-To: karabair@gmail.com To: airdivision1@deq.virginia.gov

Thu, Sep 6, 2018 at 2:31 PM

I urge the VA State Air Pollution Control Board and the Department of Environmental Quality (DEQ) to deny the air pollution permit for the Atlantic Coast Pipeline (ACP) compressor station being proposed in Buckingham County.

I have had an opportunity to visit the Union Hill Community, which will be threatened by this 54,000 horsepower compression station. This station is one of the largest ever proposed by Dominion Energy, to serve the largest pipeline coming through this land. It appears that the size of the compressor station was dictated by the desire to avoid the need of multiple regulatory approvals, rather than the safety of surrounding residents, land, and water supplies. Methane, nitrous oxides, particulate matter and other volatile organic compounds may be released into the atmosphere, or a major explosion may occur.

Along with the community of Union Hill, I worry that a proper risk assessment has not been conducted. I am also concerned that the importance of the community around the compressor station is devalued because the residents are rural, African-American, and in many cases elderly. These already vulnerable community members are threatened by Dominion's callous disregard for anything but its own bottom line.

The governor's own Environmental Justice Council has strongly criticized the plans for this compressor station, and I urge the Board and DEQ to deny the permit.

Ms. Caroline Pruett 4908 Finnegan Court Henrico, VA 23228 804-305-2226



## **Deny the Buckingham Compressor Station Air Permit**

Maya White Sparks <spiralgr@shentel.net> Reply-To: spiralgr@shentel.net To: airdivision1@deq.virginia.gov

Thu, Sep 6, 2018 at 8:55 AM

I urge the VA State Air Pollution Control Board and the Department of Environmental Quality (DEQ) to deny the air pollution permit for the Atlantic Coast Pipeline (ACP) compressor station being proposed in Buckingham County This 54,000 horsepower compressor station is one of the largest ever proposed by Dominion Energy and it threatens the health of this majority-black community that has loudly resisted the project since it was first announced. I also urge state regulators to immediately complete a thorough risk assessment prior to any permitting and work with other state agencies to conduct health risk and comprehensive health impact assessments at the beginning of future permitting processes.

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Ms. Maya White Sparks 102 Golden Pond Circle Stephens City, VA 22655 5408682664



## Continuing

1 message

**Suzanne Thorniley** <slthorn@cox.net> To: airdivision1@deq.virginia.gov

Thu, Sep 6, 2018 at 8:41 PM

My previous email was "sent" prematurely. As I was noting that a compressor station in this historic community seems to be a perpetuation of socially unjust exploitation.

Thank you, Suzanne Thorniley



## **Compressor Station**

1 message

**Suzanne Thorniley** <slthorn@cox.net>
To: airdivision1@deq.virginia.gov

Thu, Sep 6, 2018 at 8:38 PM

I am writing to you today to let you know that I am opposing the installation of a compressor station in Union Hill for two reasons. One, I believe the environmental impact of the unnecessary ACP along with a compressor station is a political compromise to our quality of life and integrity of our beautiful environmental well being. Secondly, to place a compressor station in a community of predominately black residents is a perpetuation of